

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATIONS OF  
UNIVERSITY PROFESSORS, ET AL.,

*Plaintiffs,*

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT OF  
STATE, ET AL.,

*Defendants.*

No. 1:25-cv-10685-WGY

**NOTICE OF SEALED  
SUBMISSION OF  
DOCUMENTS FOR  
*IN CAMERA, EX PARTE*  
REVIEW**

Pursuant to the Court's invitation to submit documents subject to privilege for *in camera* inspection, the Government respectfully submits the attached email correspondence, and associated attachments, concerning enforcement actions against specific non-party individuals. The Government wishes to emphasize that these documents are for *in camera* review only and that the Government does not waive any applicable privileges. Note, these documents do not contain privilege redactions. While these documents do contain information subject to the law enforcement and deliberative process privileges, additional privileges may also be applicable. However, undersigned counsel just received them on July 1, 2025, and a final privilege review has not been completed. These documents have not been filed in any other proceedings or otherwise shared with the specific non-party individuals discussed therein. Therefore, these documents have been withheld from Plaintiffs in full. The government is providing the documents to the Court at this time to ensure that the Court has the documents in advance of trial.

Respectfully Submitted,

BRETT A. SHUMATE  
*Assistant Attorney General*

DREW C. ENSIGN  
*Deputy Assistant Attorney General*

WILLIAM KANELIS

*Ethan B. Kanter*  
ETHAN B. KANTER  
*Chief, National Security Unit*  
*Office of Immigration Litigation*  
*P.O. Box 878, Ben Franklin Station*  
*Washington, D.C. 20001*

*Dated: July 2, 2025*

*Counsel for Defendants*